

Fact Sheet



For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-03900074-2012**
Application Received: **November 2, 2011**
Plant Identification Number: **03900074**
Permittee: **Columbia Gas Transmission, LLC**
Facility Name: **Walgrove Compressor Station**
Mailing Address: **1700 MacCorkle Avenue, S.E.**
Charleston, WV 25314

Physical Location:	367 Walgrove Rd, Elkview, Kanawha County, West Virginia 25156
UTM Coordinates:	461.76 km Easting • 4257.32 km Northing • Zone 17
Directions:	Traveling I-79N from Charleston, exit at Elkview and turn right, go a short distance to US Route 119, turn left and proceed on US Rt. 119 to the town of Blue Creek. Turn right onto Secondary Route 57, travel across the Elk River and turn left at the intersection, the station is approximately 1.5 miles from the intersection.

Facility Description

The Walgrove Station is a natural gas transmission facility covered by Standard Industrial Classification (SIC) 4922. The facility equipment at this location includes a 880 hp 2-cycle, lean burn Reciprocating Engine/Integral Compressor and a 440 hp 4-cycle, rich burn Reciprocating Engine/Integral Compressor.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2011 Actual Emissions
Carbon Monoxide (CO)	12.45	4.73
Nitrogen Oxides (NO _x)	240.15	69.95
Particulate Matter (PM ₁₀)	1.50	0.79
Total Particulate Matter (TSP)	1.50	0.79
Sulfur Dioxide (SO ₂)	0.04	0.01
Volatile Organic Compounds (VOC)	4.88	1.13
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2011 Actual Emissions
Total HAPs	2.79	1.13

Some of the above HAPs may be counted as PM or VOCs.

Title V Program Applicability Basis

This facility has the potential to emit over 240 tons per year (TYP) of NO_x. Due to this facility's potential to emit over 100 tons per year of NO_x, Walgrove Compressor Station is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR6	Open burning prohibited.
	45CSR11	Standby plans for emergency episodes.
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 63, Subpart ZZZZ	NESHAPs for RICE
State Only:	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
	45CSR4	No objectionable odors.
	45CSR17	Fugitive Particulate Matter

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
None		

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

1. This facility was previously registered under General Permit R30-NGGP-2007 for Natural Gas Compressor Facilities. The Division of Air Quality did not renew the general permit for natural gas compressor facilities, therefore this facility's renewal will be issued as a source-specific permit. The source-specific permit includes various requirements which are potentially applicable to natural gas compressor stations. The applicable requirements column in the Section 1.0 Emission Units Table of the permit indicates which of the requirements in Sections 2.0 through 24.0 are applicable to each emissions unit.
2. 40CFR63, Subpart ZZZZ "National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines" [E01 and E02]
The facility is subject to the area source requirements of this Subpart. The compliance date for these conditions is October 19, 2013. The facility has two engines. E01 is an existing 2-cycle lean burn 880 hp spark ignition engine. E02 is an existing 4-cycle 440 hp rich burn spark ignition engine. Section 10 lists Subpart ZZZZ, while the specific applicable requirements for these engines are given in Section 1.0.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

1. 40 C.F.R. 64 - Compliance Assurance Monitoring (CAM)

According to 40 C.F.R. §64.2(a), CAM applies to a pollutant-specific emissions unit at a major source that is required to obtain a part 70 or 71 permit if the unit satisfies all of the following criteria: 1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or a surrogate thereof), other than an emission limitation or standard that is exempt under 40 C.F.R. §64.2(b)(1); 2) The unit uses a control device to achieve compliance with any such emission limitation or standard; and 3) The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source. 40 C.F.R. §64.2(b)(1)(i) exempts emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act; and 40 C.F.R. §64.2(b)(1)(vi) exempts emission limitations or standards for which a part 70 or 71 permit specifies a continuous compliance determination method. The facility does not have a control device for the engines at this facility. Therefore, CAM does not apply.

2. Greenhouse Gas Tailoring Rule

This is a renewal Title V Permit and there have been no changes that would have triggered a PSD permit. As such, there are no applicable GHG permitting requirements.

3. 45CSR10 does not apply to natural gas fired engines.

4. 40 C.F.R 60 Subpart K, Ka, or Kb is not applicable because all the tanks are less than 75 m³ capacity.

5. 45CSR21; *To Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds*: All storage tanks at Walgrove station are below 40,000 gallons in capacity which exempts the facility from 45CSR§21-28. Walgrove station is not engaged in the extraction or fractionation of natural gas which exempts the facility from 45CSR§21-29.

6. 45CSR27; *To Prevent and Control the Emissions of Toxic Air Pollutants*: Natural gas is included as a petroleum product and contains less than 5% benzene by weight. 45CSR§27-2.4 exempts equipment “used in the production and distribution of petroleum products providing that such equipment does not produce or contact materials containing more than 5% benzene by weight.”

7. 40 C.F.R. 60 Subpart IIII “Standards of Performance for Stationary Compression Ignition Internal Combustion Engines” - There are no compression ignition engines at the facility.

8. 40 C.F.R. 60 Subpart JJJJ “Standards of Performance for Stationary Spark Ignition Internal Combustion Engines” – Engines at the facility were constructed, reconstructed, or modified prior to June 12, 2006.

9. 40 C.F.R. 60 Subpart GG “Standards of Performance for Stationary Gas Turbines” - There are no turbines at the facility.

10. 40 C.F.R. 60 Subpart KKKK “Standards of Performance for Stationary Combustion Turbines” – There are no turbines at the facility.

11. 40 C.F.R. 60 Subpart YYYY “National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines” – There are no turbines at the facility.

12. 40 C.F.R. 63 Subpart HHH “National Emission Standards for Hazardous Air Pollutants from Natural Gas Transmission and Storage Facilities” – Facility is not a major source of HAP emissions and does not have a glycol dehydration unit.

Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: September 12, 2012
Ending Date: October 12, 2012

All written comments should be addressed to the following individual and office:

Mike Egnor
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Mike Egnor
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Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1208 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Not applicable.